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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEXANDER ZUKOVSKI,

Defendant.

Case No. 2:20-CR-00349-GMN-BNW

Stipulation for Protective Order

The parties, by and through the undersigned, respectfully request that the Court issue an order protecting from disclosure to the public, or any third party not directly related to this case, any documents, recordings, or other tangible things produced by the government during discovery that contain the confidential personal identifying information of individuals referenced in the discovery. The parties state as follows:

1. The indictment in this case issued on December 15, 2020.

2. Trial is currently scheduled for July 12, 2021. Defendant Alexander Zukovski is represented by Greenberg Traurig, P.A., through attorneys Gregory Kehoe, Jordan Behlman, and Jason Hicks. Jason Hicks noticed his appearance on December 17, 2020. The Court granted the Motions for Admission *pro hac vice* of Gregory Kehoe and Jordan Behlman on January 7, 2021.

1 3. The indictment in this case arises out of alleged wire fraud against investors
2 in a company operated by defendant. The discovery therefore contains the personal
3 identifying information, such as names, bank account information, and contact/residence
4 information of the defendant and the individuals whom defendant is alleged to have
5 defrauded and attempted to defraud. The release of such information to the public or third
6 parties not involved in the case could endanger the privacy of these individuals and also
7 subject them to potential misuse of their identities. This confidential personal identifying
8 information is referred to here as the "Protected Information" and is subject to this
9 protective order.

10 4. In order to protect the privacy of the individuals referenced in the discovery,
11 the parties intend to restrict access to the following individuals: defendant, attorneys for all
12 parties and any personnel that the attorneys for all parties consider necessary to assist in
13 performing that attorney's duties in the prosecution or defense of this case, including
14 investigators, paralegals, retained experts, support staff, interpreters, and any other
15 individuals specifically authorized by the Court (collectively, the "Covered Individuals").

16 5. The Covered Individuals shall be advised of the Protective Order, and,
17 without leave of Court, the Covered Individuals shall not:

- 18 a. make copies for, or allow copies of any kind to be made by any other
19 person of the Protected Information in this case;
- 20 b. allow any other person to read, listen, or otherwise review the
21 Protected Information in this case;
- 22 c. use the Protected Information for any purpose other than preparing to
23 defend against or prosecute the charges in the Indictment or any
24 further superseding indictment arising out of this case; or

d. attach any Protected Information to any of the pleadings, briefs, or other court filings except to the extent those pleadings, briefs, or filings are filed under seal or properly compliant with LR IC 6-1.

6. Nothing in this stipulation is intended to restrict the parties' use or introduction of the Protected Information as evidence at trial or support in motion practice.

7. The parties shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

8. By the date of sentencing in this matter, or seven days after acquittal, whatever the case may be, the sentenced or acquitted defendant shall return to defense counsel any part of the Protected Information in this case that was furnished to him by his defense attorney. To the extent any Protected Information was provided to the defendant pursuant to a subsequent order of the Court, the defendant shall also return any part of the Protected Information that was furnished to him.

9. The parties reserve the right to seek to modify the terms of this protective order at a later time pursuant to Federal Rule of Criminal Procedure 16(d)(1). Should a reasonable need for this protective order cease to exist, on grounds other than a Covered Individual or some other person violating or circumventing its terms, the Government will move expeditiously for its dissolution.

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1 10. The defense hereby stipulates to this protective order.
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3 Respectfully submitted,

4 For the United States:

5 NICHOLAS A. TRUTANICH
6 United States Attorney

7 s/ Jessica Oliva
8 JESSICA OLIVA
9 Assistant United States Attorney

10 For the Defense:

11 s/ Jordan Behlman
12 JORDAN BEHLMAN
13 Greenberg Traurig, P.A.
14 Attorney for DEFENDANT ZUKOVSKI

15 ORDER

16 **IT IS SO ORDERED**

17 **DATED:** 6:24 pm, January 25, 2021

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19 **BRENDA WEKSLER**
20 **UNITED STATES MAGISTRATE JUDGE**
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